

2014-2015 Utility Vendor Meeting Frequently Asked Questions (FAQ)

These questions were posed and answered during the PY2015 Utility Vendor Meeting held via webinar on 9/17/14, located at ihcda.in.gov

Memorandum of Understanding (MOU)

Q: How do we find out if our new parent company has provided the MOU for our office?

A: Vendors may contact Ms. Lindsay O'Brien, at lobrien@ihcda.in.gov, or 317.234.7571.

Q: Why is bank information needed every year on an existing company?

A: The MOU is non-renewable therefore all information must be updated every year.

Q: Can leveraging funds be used for leak testing, if the household is out of gas or if the vendor needs to unlock a tank?

A: Yes, agencies may use Leveraging funds to cover this cost, if funds are available.

Q: Define regulated versus unregulated.

A: IHCDA defines a **regulated utility** as vendors who are classified as municipally owned, privately owned, or cooperatively owned are considered "regulated utilities" under the Low Income Home Energy Assistance Program for Indiana. IHCDA defines a **unregulated utility** as households who use bulk fuels as their primary heating source are considered "unregulated utilities" under the Low Income Home Energy Assistance Program for Indiana

Q: Who determined that \$60 is enough to cover the electric usage during the moratorium period with electric heat?

A: Indiana is a "Heating State," which means that its primary and winter program focuses on providing heating benefits to households. If a client heats with electric, they may to apply their entire benefit award to their electric account. Additionally, if a client with a regulated account has a credit on their gas or metered bulk fuel account that is over \$500.00 they may **waive** their benefit award completely or in part to their electric or return later to apply the benefit to their primary heating source.

Q: If Indiana does not have funds to cover benefits client are listed in a HOLD status: Will the HOLD status file be the same as a transmittal with zero benefit and include the USP indicator?

A: Yes, the benefit amount will be listed as -0-.

Q: Do we have to post the pledge to the account when we receive it in November. Can we wait to post the pledge until December 1.

A: Any amount pledged and accepted by the vendor should be posted to the account at the time of notification.

Q:“Benefits should be applied to the client’s utility usage only.” Does this mean that we have to give them a TAX credit for the amount pledged?

A: Although EAP benefits do not cover taxes on the bill, IHCDCA does not mandate that tax credits are extended to clients.

Q: Benefits are only given to homeowners? What about renters?

A: State EAP benefits are given to homeowners ONLY. Homeowners are eligible for \$60 regular EAP benefits with their initial winter application and up to \$150 in State Crisis assistance at the time of their initial winter application. Homeowners may also return after March 15, for an additional \$150 State Crisis assistance, if needed.

Limiters and Metered Clients:

Q: Does this mean that these customers cannot be disconnected during the moratorium?

A: Correct, vendors who render service using limiters, meters and prepaid services must provide moratorium protection to EAP clients as prescribed in IC 8-1-2-121 and the annual EAP memorandum of understanding.

Q: Can limiters still be used during the moratorium period to limit energy consumed, as long as the customer is not disconnected?

A: Yes, vendors may impose daily or other time limits to its clients wherein a very brief interruption of service is used to notify a client that they are nearing or over their maximum usage. An interruption longer than thirty minutes to an hour may be in breach of IC 8-1-2-121 and the annual EAP memorandum of understanding.

Energy Cost and Consumption Data Collection:

Q: Will requests for this data be sent to the parent office or the branch that supplies the fuel to your client?

A: This will be determined by guidance from your company’s parent office and IHCDCA will comply thereafter.

Q: Are vendors required to provide this information for every customer who receives benefits, every month, or just for the customers you request information for?

A: IHCDCA hopes that vendor records for clients receiving EAP and the list submitted from our office will match. IHCDCA will send a list of clients who have received EAP and vendors should provide the

data for the clients listed with a monthly breakdown of the information requested, i.e. Cost and Consumption.

Q: Our rental security light fee includes an allowance for the electricity used by the light.

A: This fee should be excluded from the cost data provided to IHCD.

Q: It was previously stated that the customer must have service at the address for every month in the preceding year from the date of their EAP application, however, now I understand that vendors will need to report a client's energy consumption for multiple addresses, is this correct?

A: *Data should be included for households who lived at the same service address during the entire reporting period (10/1/14 through 9/30/15).* This is ONE address; IHCD has decided to begin with households/client who have lived at the SAME/ONE address the entire reporting period. If the client moves or has lived at multiple addresses within the vendor's service territory, no report is necessary.

Q: If the account is combo (gas and electric) and the gas is the heat source, do you still require the electric consumption on the report.

A: Yes, the energy consumption data and cost should be reported separately for gas and electric.

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Q: Do we have to use the spreadsheet examples provided by IHCD, or can we use an internal report that captures Monthly Cost and Usage information and submit to IHCD?

A: Vendors may use their internal reports to provide this information to IHCD, preferably in Excel format. A secure file is required.

Q: Can we just send you a copy of their electric bill?

A: IHCD prefers that minimum reporting method of the Cost and Usage data is an excel spreadsheet.

Refunds

Q: If a customer moves or quits our company, are we required to refund the credit on their account to IHCD or do these funds go to the customer.

A: A vendor should make a reasonable effort to refund any credit to the clients account directly to the client or apply it to the next month of service, if applicable. If the vendor does not have a forwarding address for the client, then the funds should be returned to IHCD within 60 days.

Q: If a client has a large credit on their account from either monies that they have paid in or from prior energy assistance, after 90 days does IHCD require the vendor to return the unused monies?

A: IHCD does not want a refund of credit that belongs to the client and/or payments from non-EAP funds. If the vendor cannot apply the credit to the next month's bill or refund the credit to the client, then a refund check should be submitted to IHCD with ONLY the EAP funds that were a part of the credit.

Q: Is the vendor required to use the energy assistance benefit first toward the account balance?

A: IHCD does not require vendors to use its EAP funds first.

Overpayments

Q: If our company owes IHCD an overpayment, will IHCD draft a payment from our bank account?

A: No. A written communication will be sent to your company if overpayments are not received within 60 days.

Moratorium

Q: If a customer has a letter of approval for EAP before December 1, but defaults on a payment arrangement are they endanger of being disconnected?

A: A vendor must give its clients a reasonable amount of time to pay its balance prior to disconnection before December 1. If a client has active service on December 1, and are approved for EAP that client's service cannot be scheduled for disconnect until after March 15.

Q: This means that the customer must be approved in order to be protected by moratorium, correct? Not just have applied?

A: Correct, clients with an approved EAP application are covered by moratorium December 1 – March 15.

Q: Are you saying that if we are no longer regulated by the IURC we are STILL regulated by this policy?

A: If your company is categorized by the Indiana Code as a municipally owned, privately owned or cooperatively owned utility you are mandated by law to comply with IC-8-1-2-121.

Q: Can a vendor refuse to establish a payment arrangement during the month of November, if it knows a client will fall under the moratorium as of 12/1?

A: IHCD contract prohibits any vendor from any discriminatory action against client because of their EAP eligibility status. If this is a vendor's policy, this policy would be applied to all customer, not just EAP clients.

Q: A landlord can disconnect a client's account for breach of payment agreement but the utility cannot, is this correct?

A: Yes, this is correct, if the landlord is the customer of record they can disconnect their own service if their tenant breaches a payment agreement.

Q: Are propane companies regulated if they are a cooperative?

A: Cooperatively owned vendors must adhere IC 8-1-2-121 and cannot disconnect EAP clients between December 1 – March 15.

Q: Does the State send the monies to the client if the vendor is not accepting energy assistance for them to pay the bill?

A: Indiana is a NO DIRECT PAY state, therefore IHCD will only send payments to a vendor with a valid MOU on file.

Q: Can a vendor require that the crisis benefit is given to complete the 30 day balance due if the regular benefit is not enough to get the client to Dec 1?

A: The client's current bill should reflect the amount needed to bring the account current. If the client is in disconnect status and the regular benefit amount does not cover the disconnect amount, crisis should be extended to the client. If the regular amount and crisis amount do not cover the disconnect amount of the bill, the client is required to pay the difference and provide verification of such, before ANY benefits are released to their account.

Q: If a customer chooses prepaid, for whatever reason(s), they cannot be disconnected during the moratorium? That essentially means to most vendors, that they are not eligible for prepaid, and will most likely have to pay a deposit. That doesn't seem like a win-win to the customer.

A: If it is the vendor's policy that client's eligible for moratorium, who select prepaid services, are required to pay a deposit, IHCD recommends that this policy apply to all customers who select this service option. EAP clients must receive the same service options as all other customers.

Q: Does the moratorium officially begin 12/01/14?

A: Yes.

Q: Is a transmittal what protects a client under moratorium or does a voucher work?

A: The transmittal or a pledge by phone from the agency may be used to notify the vendor that the client has an approved EAP application.

Other

Q: When will the EAP Manual be available? It is not online at this time.

A: The 2014-2015 Manual and Appendices has been posted on IHCD's Partner Website.

Q: What does the November 4th program start mean?

A: Local Service Providers begin seeing clients on November 3, we anticipate that November 4, will be the start of pledges. ***Vendors can anticipate receiving transmittals beginning November 1.***

Q: Has everything been covered today in the webinar, if we are unable to go on Oct 16?

A: The conference will go over several of the same information but there will be many more presenters. It will be a great meeting to attend.